

1 HEATHER E. WILLIAMS, CA Bar #122664  
2 Federal Defender  
3 REED GRANTHAM, CA Bar #294171  
Assistant Federal Defender  
Office of the Federal Defender  
2300 Tulare Street, Suite 330  
Fresno, CA 93721-2226  
Telephone: (559) 487-5561  
Fax: (559) 487-5950

6 Attorneys for Defendant  
RYAN WILSON

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8 IN THE UNITED STATES DISTRICT COURT  
9 FOR THE EASTERN DISTRICT OF CALIFORNIA

10  
11 UNITED STATES OF AMERICA,  
12 Plaintiff,  
13 vs.  
14 RYAN WILSON,  
15 Defendant.

Case No. 1:21-cr-00315-ADA-BAM

**[AMENDED] STIPULATION TO  
CONTINUE STATUS CONFERENCE;  
ORDER**

Date: July 12, 2023  
Time: 1:00 p.m.  
Judge: Hon. Barbara A. McAuliffe

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17 IT IS HEREBY STIPULATED by and between the parties through their respective  
18 counsel, Assistant United States Attorney Kimberly Sanchez, counsel for plaintiff, and Assistant  
19 Federal Defender Reed Grantham, counsel for Ryan Wilson, that the status conference currently  
20 scheduled for April 12, 2023, at 1:00 p.m. may be continued to July 12, 2023, at 1:00 p.m.

21 The parties agree and stipulate, and request that the Court find the following. The  
22 government has provided discovery in this matter. The defense remains in the process of  
23 reviewing the discovery, conducting further investigation, and discussing the matter with his  
24 client.

25 Specifically, the defense has made the government aware of the pending investigative  
26 efforts of the defense, which include the need to visit the location of the alleged offense situated  
27 in the mountains of the Sierra National Forest near Shaver Lake, California. This investigative  
28 effort has been delayed since mid-December as a result of weather conditions at the location of

1 the alleged offense. Efforts to visit the site since the last stipulation submitted by the parties in  
2 February 2023 have been thwarted by continued weather events and conditions located at and  
3 near the site. Throughout this time, the parties have remained in contact and the government has  
4 been actively assisting efforts to accomplish the visit to the site. However, at present, according  
5 to the officers familiar with the location, the site is inaccessible. The parties anticipate trying  
6 again the coming 2-4 weeks, weather and conditions permitting. Accordingly, the parties request  
7 that the status conference in this matter be continued to permit this continued defense  
8 investigation, as well as for possible plea negotiations.

9           The requested continuance will conserve time and resources for the parties and the Court.  
10          Counsel for defendant believes that failure to grant the above-requested continuance would deny  
11          him the reasonable time necessary for effective preparation, taking into account the exercise of  
12          due diligence. The government does not object to the continuance.

13       Based on the above-stated findings, the ends of justice served by continuing the case as  
14      requested outweigh the interest of the public and the defendant in a trial within the original date  
15      prescribed by the Speedy Trial Act. For the purpose of computing time under the Speedy Trial  
16      Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of April 12,  
17      2023, to July 12, 2023, inclusive, is deemed excludable pursuant to 18 U.S.C. §§ 3161(h)(7)(A)  
18      and 3161(h)(7)(B)(i), (ii) and (iv) because it results from a continuance granted by the Court at  
19      defendant's request on the basis of the Court's finding that the ends of justice served by taking  
20      such action outweigh the best interest of the public and the defendant in a speedy trial.

Respectfully submitted,

**PHILLIP A. TALBERT**  
United States Attorney

24 | Date: April 7, 2023

/s/ Kimberly Sanchez  
KIMBERLY SANCHEZ  
Assistant United States Attorney  
Attorney for Plaintiff

1 HEATHER E. WILLIAMS  
2 Federal Defender

3 Date: April 7, 2023

4 /s/ Reed Grantham  
5 REED GRANTHAM  
Assistant Federal Defender  
Attorney for Defendant  
RYAN WILSON

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8 **ORDER**

9 IT IS SO ORDERED that the status conference is continued from April 12, 2023, to **July**  
10 **12, 2023, at 1:00 p.m. before Magistrate Judge Barbara A. McAuliffe.** Time is excluded  
11 pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and 3161(h)(7)(B)(i), (ii) and (iv).

12 IT IS SO ORDERED.  
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14 Dated: April 7, 2023

15 /s/ Barbara A. McAuliffe  
16 UNITED STATES MAGISTRATE JUDGE

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